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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,

Case No.: 13-cv-05878 EMC

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

**DECLARATION OF JULIA HARUMI  
MASS IN SUPPORT OF JOINT  
STIPULATION AND VOLUNTARY  
DISMISSAL OF LOURDES  
HERNANDEZ-TRUJILLO**

CLASS ACTION

1 I, Julia Harumi Mass, declare as follows:

2       1. I am a staff attorney at the American Civil Liberties Union Foundation of  
3 Northern California (“ACLU”) and one of the lawyers representing named Plaintiffs Audley  
4 Barrington Lyon, Jr. and José Elizandro Astorga-Cervantes and the class of all current and future  
5 immigration detainees who are or will be held by Immigration and Customs Enforcement in  
6 Contra Costa, Sacramento, and Yuba Counties (collectively, “Plaintiffs”) in the above-captioned  
7 matter. I submit this declaration in support of the parties’ Joint Stipulation and Voluntary  
8 Dismissal of Lourdes Hernandez-Trujillo.

9       2. After a meeting at my office on November 17, 2014 with Ms. Hernandez-Trujillo,  
10 in which we discussed upcoming discovery obligations and scheduled a follow up meeting,  
11 Plaintiffs’ counsel lost touch with Ms. Hernandez-Trujillo for several months.

12       3. Ms. Hernandez-Trujillo did not show up for a scheduled meeting on December  
13 17, 2014.

14       4. From that time until February 2015, I directed a fellow at the ACLU, Megan  
15 Sallomi, to call and email Ms. Hernandez-Trujillo. Ms. Sallomi told me that she repeatedly  
16 called and emailed but was never able to reach Ms. Hernandez-Trujillo.

17       5. On December 23, 2014, I directed Ms. Sallomi to mail a letter to Ms. Hernandez-  
18 Trujillo to the two mailing addresses that Plaintiffs’ counsel has on file for her via U.S. mail,  
19 reminding Ms. Hernandez-Trujillo of her obligations as a Lead Plaintiff in this case.

20       6. On January 30, 2015, I wrote a letter to Ms. Hernandez-Trujillo, notifying her that  
21 she would be dismissed from this case if she did not contact counsel by February 5, 2015. My  
22 assistant mailed the letter to the two mailing addresses that we had on file for her via U.S. mail,  
23 and Ms. Sallomi sent a copy to Ms. Hernandez-Trujillo via email.

24       7. On March 4, 2015, Plaintiffs’ counsel moved this court to withdraw as counsel for  
25 Ms. Hernandez-Trujillo and filed a Joint Stipulation and Voluntary Dismissal for Ms.  
26 Hernandez-Trujillo. Dkt. Nos. 79 and 80.

27       8. On March 6, 2015, the Court ordered Plaintiffs’ counsel to provide the “best

1 notice possible" to Ms. Hernandez-Trujillo regarding the status of her case. Dkt. No. 81.

2 9. On March 12, 2015, my office sent letters via certified mail to both of Ms.  
3 Hernandez-Trujillo's known addresses. We also tried the telephone number and email address  
4 we had for her, but were unable to reach her.

5 10. On or about March 27, 2015, we received news from Ms. Hernandez-Trujillo's  
6 immigration attorney that Ms. Hernandez-Trujillo had a new telephone number. In the days that  
7 followed, we reestablished contact with Ms. Hernandez-Trujillo. We learned that she had moved  
8 her residence and her post office box and changed her telephone number. We also learned that  
9 she has been extremely busy and distracted due to serious medical problems of several family  
10 members.

11 11. I met with Ms. Hernandez-Trujillo on April 3, 2015 and we agreed that demands  
12 on her time related to the medical care of her family members made it difficult for Ms.  
13 Hernandez-Trujillo to continue as a class representative. She agreed that we should voluntarily  
14 dismiss her claims and signed an agreement to that effect, a true and correct copy of which is  
15 attached hereto as Exhibit "A."

16 12. Today, I requested and received Defendants' agreement to the voluntary dismissal  
17 of Ms. Hernandez-Trujillo's claims.

18 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
19 knowledge. Executed on April 6, 2015, in San Francisco, California.  
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22 /s/ Julia Harumi Mass  
23 JULIA HARUMI MASS  
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# Exhibit A

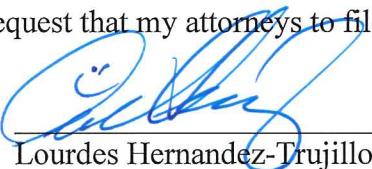
**AGREEMENT TO DISMISS CLAIMS**

*Audley Barrington Lyon, Jr., et al. v. U.S. Immigration Customs Enforcement, et al.;*

Case No. 13-CV-05878 (EMC)

In light of my recent difficulty in maintaining contact with my attorneys and significant time pressures that have come up related to care for my family, I agree to withdraw as a class representative in the above-referenced case and I request that my attorneys to file a voluntary dismissal on my behalf.

Dated: April 3, 2015



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Lourdes Hernandez-Trujillo